

REMARKS

Claim 1 is rejected under 35 U.S.C. 102(b) as being anticipated by Zito who discloses a "cell 10 with a +^{ve} electrode 12 and a -^{ve} electrode 14 and a cation membrane 16 formed from a fluorocarbon polymer with styrene sulfonic acid...to provide charge carriers. The membrane 16 acts to separate the +^{ve} and -^{ve} sides of the cell 10 and is selected to minimize migration of bromine..." (Column 6, lines 16-21).

It should be understood that an electrolyte formed on one side of the membrane 16 is different from an electrolyte on the other side of the membrane 16. Zito explains that the membrane 16 "separates the electrolytes and prevents bulk mixing..." (Column 6, lines 52 and 53)

Unlike Zito, claim 1(amended) calls for a plurality of cells each having an electrode pair within a liquid therein. Moreover, there is "no structural member" such as a cation membrane separating the electrodes of a pair. Therefore, there is no possibility of a bromine migration. In other words, apparatus called for in claim 1(amended) is vastly different from what Zito discloses. For reasons given hereinbefore, claim 1 is allowable over the ground of rejection.

Since claim 1 is the only independent claim in the application and has been shown to be allowable, claims 2-7, as amended, are allowable.

Respectfully submitted,



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